



July 1, 2024

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VIA ECF

The Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 425
New York, New York 10007

**RE: WRE DEFENDANTS' CONSENTED-TO REQUEST FOR EXTENSION OF
TIME TO RESPOND TO THE COMPLAINT**

Brockmole, et al. v. EZ Festivals LLC, et al., Case No. 1:23-cv-08106-VM

Dear Judge Willis:

Our firm has been retained to represent Defendants WRE Parent US Holding Corp. Inc. and WRE Management LLC, in the above-referenced matter. Pursuant to Rule I.G. of Your Honor's Individual Practices, **we write on consent of Plaintiffs to respectfully request an extension of time for WRE Parent US Holding Corp. Inc. and WRE Management LLC, to answer or otherwise respond to the Complaint until August 7, 2024.**

This is WRE Parent US Holding Corp. Inc. and WRE Management LLC's second request for an extension of their time to answer or otherwise respond to the Complaint. As noted, counsel for Plaintiffs consent to this extension. This request is made because Defendants Phillip Wiederkehr, Gardner Purchaser LLC, Wiederkehr Associates, Stewart Purchaser LLC and WRE Holding AG are presently in the process of retaining our firm in connection with this matter. This extension will allow us to hopefully finalize that retention and thereafter to coordinate the response of all of the foregoing parties to the Complaint, saving the time and resources of the Court and parties alike. The requested extension will not affect any other scheduled dates in this matter.

We appreciate the Court's consideration of this request.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

/s/ Richard W. Boone, Jr.

Richard W. Boone Jr.

cc: All Counsel of Record (*via ECF*)

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